

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

(sd 2354)

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JOANNE SANTORA,

Plaintiff,

-against-

COSTCO WHOLESALE CORPORATION,

Defendant.
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Civil Action No.:
17-cv-04415 (CS) (LMS)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

**Seibel, J.
Smith, M.J.**

MOTION BY: Defendant COSTCO WHOLESALE CORPORATION
(hereinafter "Costco"), by its attorneys,
SIMMONS JANNACE DELUCA, LLP

SUPPORTING PAPERS: The Affidavit of Sal F. DeLuca, dated March 23, 2018 and all exhibits and affidavits annexed thereto; accompanying Memorandum of Law in support of defendant Costco's motion for summary judgment; Rule 56.1 Statement of Material Facts; and all prior pleadings and proceedings heretofore had herein.

**RETURN DATE, TIME
AND PLACE:**

United States District Court, Southern District of New York, at the Courthouse thereof, located at: 300 Quarropas Street, White Plains, New York, before The Honorable Judge Cathy Seibel, on a date to be selected by the court.

RELIEF SOUGHT: An Order pursuant to F.R.C.P. 56(b): (1) dismissing plaintiff's Verified Complaint for failure to establish a *prima facie* case of negligence against Costco; and (2) for such other and further relief as this Court may deem just and proper.

ANSWERING PAPERS: Answering papers, if any, are required to be served upon the undersigned by April 13, 2018. Reply papers are required to be served by April 25, 2018.

Dated: Hauppauge, New York
March 23, 2018

Yours, etc.

SIMMONS JANNACE DELUCA, LLP

BY: 

SAL F. DELUCA (SD-2354)

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